

EXHIBIT A

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

CASE NO.: 19-cv-03377-LAP

VIRGINIA L. GIUFFRE,

Plaintiff,

vs.

ALAN DERSHOWITZ,

Defendant.

_____ /

REMOTE

DEPOSITION OF: Rebecca Boylan

DATE TAKEN: October 18, 2021

TIME: 11:20 a.m. - 1:54 p.m.

PLACE: Zoom Video Conference

TAKEN BEFORE: Derron Ross, Court Reporter
And Notary Public State of Florida

TRANSCRIBED BY: Glenn Reed

* * * * *

1 Q. I'm going to call her Ms. Giuffre unless you
2 would like me to call her something else?

3 A. No.

4 Q. How did you know her?

5 A. I knew her, I met her in school. We went to
6 South Florida Academy together and that was in
7 elementary school.

8 Q. Do you remember what grade you met her in?

9 A. I think it was either second or third grade.

10 Q. So when you were quite young?

11 A. Yeah, eight or nine-ish.

12 Q. And did you carry on your friendship through
13 high school?

14 A. Uh-huh.

15 Q. Okay. I should have added this. He can't
16 take down uh-huh. It has to be either a yes or no.

17 A. Oh, I'm sorry. Yes.

18 Q. It's okay. No one other than lawyers should
19 ever be used to this.

20 A. Yeah. Yes.

21 Q. Thank you. Now, how would you describe your
22 friendship with Ms. Giuffre during that time period from
23 when you first met her through high school?

24 A. How would I describe it? When we were
25 children, we were very, very close. But I want to say

1 once we were teenagers, we kind of, we always stayed
2 friends, but we would lose touch now and then. And, you
3 know, we had some fights along the way, so we kind of
4 had a few breakups, I guess you could say, in our
5 friendship.

6 Q. We'll get to that.

7 A. Okay.

8 Q. In the second grade, when you met Ms. Giuffre,
9 were you like eight years old?

10 A. Yeah, about eight years old.

11 Q. Would you say that for a period of time as
12 children, you were best friends?

13 A. Yes.

14 Q. Did you consider her your best friend?

15 A. I did, yeah.

16 Q. Were you the type of best friends who told
17 each other things?

18 A. Yes.

19 Q. Were you the type of best friends that told
20 each other everything?

21 A. Yes.

22 Q. Now, I know I'm asking about a significant
23 period of time but --

24 A. Mhm.

25 Q. Would you visit with her at her home?

1 you know, she hinted. I mean, it became obvious to me,
2 you know, that he was buying her lots of things, and
3 taking her on shopping sprees. And, you know, she had,
4 you know, like little spa days. You know, things like
5 that, to that nature.

6 Q. Did she seem to enjoy all of that?

7 A. Yeah. Yes, she did.

8 Q. Did she tell you she enjoyed all of it?

9 A. Yes, she did.

10 Q. Now at some point Ms. Giuffre moved and the
11 two of you fell out of touch for a while.

12 Is that right?

13 A. Yes.

14 Q. Do you recall how old you were or what year it
15 was?

16 A. I believe we fell out of touch probably I was
17 20, so she would have been 20 or 21. It was after she
18 got married to Robbie is when we fell out of touch.

19 Q. So that would have been in 2002,
20 approximately?

21 A. Yes.

22 Q. Now, during the period of time that the two of
23 you fell out of touch in some point in 2002.

24 A. Mhm.

25 Q. Did she ever tell you that she was being

1 (Whereupon, Defendant's Exhibit Boylan 01 was
2 marked for identification.)

3 BY MR. COOPER:

4 Q. I'm showing you what's been marked as --

5 A. Oh, 2011, okay.

6 Q. Exhibit 1. Do you recognize the messages that
7 are on this document, and take your time and look --

8 A. Yes.

9 Q. -- through it if you'd like.

10 A. Yes, I do.

11 Q. And what are these documents?

12 A. These are messages through Facebook, my
13 private, you know, private messages.

14 Q. Between whom?

15 A. Virginia and I.

16 Q. And does this, seeing this document, refresh
17 your memory as to when it was the two of you got back in
18 touch?

19 A. Yeah, I see it's 2011, not '10.

20 Q. And did the two of you exchange the messages
21 that are reflected in this document?

22 A. Yes. Now, and just so it's clear, between
23 2002 and May of 2011, you had no contact with Ms.
24 Giuffre.

25 Is that fair?

1 A. That's fair to say, yes.

2 Q. Now, after the two of you resumed contact. Do
3 you know where she was, or strike that.

4 Based on what she told you, do you know where
5 she was living at the time the two of you resumed
6 contact?

7 A. Before we resumed contact?

8 Q. No, no. At the time you resumed contact?

9 A. Oh yes, I knew where she was living?

10 Q. Where was she living?

11 A. In Australia.

12 Q. So, is it fair to say that for some period of
13 time your communications were just via the internet?

14 A. Mostly, it started off for a little while on
15 Facebook. But we were calling each other most of the
16 time.

17 Q. You anticipated my next question which is, did
18 you resume your friendship?

19 A. Yes.

20 Q. And how did you resume your friendship?

21 A. Over the phone.

22 Q. And did you talk frequently?

23 A. Yes, I would say we did.

24 Q. Were you glad about resuming your friendship?

25 A. Absolutely, yes.

1 Q. When did you last talk to Ms. Giuffre?

2 A. When we, when would have been the last time?

3 I guess it would have been like 2014, maybe.

4 Q. Would it refresh your memory if I suggested
5 that you and your husband reached out to Professor
6 Dershowitz in April of 2015?

7 A. Okay. Yeah, so probably, it was in 2015,
8 then.

9 Q. Now, between the time that you and Ms. Giuffre
10 resumed your friendship, and the time that you stopped
11 talking with each other in 2015.

12 A. Right.

13 Q. Did Ms. Giuffre mention anything to you about
14 a rich guy in Ohio?

15 A. She mentioned to me about a, I don't remember
16 Ohio, but a man that owned Victoria's Secret, Limited
17 Too, these, you know, clothing stores.

18 Q. And what did she say?

19 A. That he had lots of money, and they were going
20 to be going after him, and it would be a lot of money.

21 Q. On how many occasions did she say that to you?

22 A. I could say for sure at least two times, for
23 sure.

24 Q. And are you able to be more specific about
25 what she said or is that your best memory?

1 there was going to be --

2 Q. Wait. I need to ask you a question.

3 What did she say to you?

4 A. She said that I never wanted to go after Alan.

5 That she had felt pressured by her lawyers to go after
6 Alan.

7 Q. Did she tell you who her lawyers were?

8 A. She may have, but I don't remember.

9 Q. If I suggested the name David Boies to you,
10 does that refresh your memory?

11 A. No.

12 Q. What about the name Sigrid McCawley?

13 A. No.

14 Q. You just don't have a memory of her giving you
15 the names of lawyers?

16 A. No, I don't.

17 Q. Now, as of the time she said this to you, she
18 had never told you that she had sex with Alan
19 Dershowitz, had she?

20 A. No, she never had.

21 Q. And she never told you she had even met him.

22 Correct?

23 A. Correct, yes.

24 Q. Now, did she, strike that.

25 Do you remember where, strike that too.

1 Q. Why did you believe she was lying about
2 Professor Dershowitz?

3 MR. KIRK: Objection to the form of the
4 question.

5 THE WITNESS: Why did I believe she was lying?
6 I think it was money, and it was just, I feel like it
7 was, you know, he was kind of like roped in with
8 everybody.

9 MR. COOPER: Like me rephrase my question.

10 THE WITNESS: I didn't mean for you to guess
11 about what --

12 THE WITNESS: Oh, okay.

13 MR. COOPER: Professor Dershowitz was
14 thinking.

15 BY MR. COOPER:

16 Q. Why did you --

17 A. Mhm.

18 Q. Come to the conclusion in your own mind.

19 A. Okay.

20 Q. That Ms. Giuffre was lying in making
21 allegations about Professor Dershowitz?

22 MR. KIRK: Objection. Lack of foundation.

23 THE WITNESS: Because she said she never
24 wanted to. Why would you go after someone that, you
25 know, why would you say that if somebody. You saying

1 that this person abused you. Why would you say you
2 never wanted to go after them? It doesn't add up.

3 BY MR. COOPER:

4 Q. Now, when Ms. Giuffre and her family visited
5 with your family, I take it there was a lot of
6 conversation that went on between everybody?

7 A. Yes.

8 Q. And is it fair to say that there were
9 occasions where your husband might be talking to Ms.
10 Giuffre, and you wouldn't necessarily have been a
11 participant?

12 A. Yes.

13 Q. And likewise, you would be talking with Ms.
14 Giuffre where he wouldn't have been a participant?

15 A. Yes.

16 MR. COOPER: Now, I want to focus, as best we
17 can, on what it is that you recollect telling, you and
18 your husband, telling Professor Dershowitz after you
19 spoke with him, or when you spoke with him.

20 And to do that.

21 Do I need to re-mark this?

22 MR. KIRK: No.

23 MR. COOPER: Okay.

24 BY MR. COOPER:

25 Q. I'm going to show you, I have a hard time with

1 foundation.

2 THE WITNESS: Yeah, in the beginning we saw
3 each other pretty often. Like, I want to say that first
4 year. But then like the last couple years, no.

5 BY MR. KIRK:

6 Q. And, and during this period, did you also talk
7 to her on the phone once in a while?

8 A. Yes.

9 Q. I think you said once a month, is that?

10 A. During the time she was with Jeffrey?

11 Q. Yes, or was it less frequently?

12 A. In the beginning, frequent. Towards the end,
13 only a couple times. Like that last year, yeah.

14 Q. So, so, the contact between the two of you
15 kind of fell off as time went on during the period she
16 was with --

17 A. Yes, that was fair to say. Yes.

18 Q. -- with Jeffrey?

19 A. Yes.

20 Q. Just to complete my question.

21 A. Now, I think you testified that during this
22 period when she was with Jeffrey Epstein, she never told
23 you about, to use your phrase which I like, any of her
24 experiences with any of the people in Jeffrey's ring.

25 Is that right?

1 MR. COOPER: Object to the form and lack of
2 foundation.

3 THE WITNESS: Yes.

4 BY MR. KIRK:

5 Q. She never mentioned having any contact with
6 any of Jeffrey Epstein's associates during this time?

7 MR. COOPER: Object to the form and lack of
8 foundation.

9 THE WITNESS: Yes.

10 BY MR. KIRK:

11 Q. Did she ever tell you that she had sexual
12 contact with Jeffrey Epstein himself during this period
13 of time?

14 A. No.

15 Q. Would it be fair to say that Virginia did not
16 share with you all of the details or even many of the
17 details of what happened with her, to her, when she was
18 with Jeffrey Epstein and his associates?

19 MR. COOPER: Object to the form and lack of
20 foundation.

21 THE WITNESS: I would say that's fair, yes.

22 BY MR. KIRK:

23 Q. Is there anything she said about Jeffrey
24 Epstein and his associates, other than he was very rich
25 and had all this money?

1 A. About Jeffrey? I, I remember her talking
2 fondly about him. I remember there was a period where
3 she wasn't going to be able to see him for some reason.
4 I think he had gotten sick, and she was very upset about
5 it.

6 Q. Did she ever tell you about any of her
7 experiences with any of Jeffrey Epstein's associates
8 during this period of time?

9 MR. COOPER: Same objection.

10 THE WITNESS: No.

11 MR. COOPER: But I did want to point out on
12 the record that this question is contrary to the
13 protective order that is pending to be filed.

14 MR. KIRK: Of course, I disagree with that,
15 but we can argue about that later.

16 BY MR. KIRK:

17 Q. At one point you testified that Virginia told
18 you, and now I'm doing the same thing my friend did, I'm
19 jumping ahead of time.

20 A. Okay.

21 Q. That, with respect to Jeffrey Epstein and his
22 associates, you used the phrase, or you said, she used
23 the phrase, she wanted to make all the monsters pay. I
24 take it that's a pretty distinctive phrase.

25 You do recall Virginia saying that?

1 A. Yes, I do.

2 Q. Was it your sense that Virginia was angry at
3 these people because they had done very bad things?

4 MR. COOPER: Object to the form. Lack of
5 foundation.

6 THE WITNESS: Yes.

7 BY MR. KIRK:

8 Q. Did she suggest that she wanted to make the
9 monsters pay because she just was greedy for money and,
10 in fact, they had not done anything bad?

11 A. Did she? No.

12 Q. In fact, the use of the word monsters pretty
13 strongly implies that she believed that the people she
14 wanted to pay had done very bad things?

15 MR. COOPER: Objection to form and lack of
16 foundation.

17 THE WITNESS: Yes.

18 BY MR. KIRK:

19 Q. Did you think Virginia was making up the
20 allegation that these monsters had done evil things?

21 MR. COOPER: Object to the form and lack of
22 foundation.

23 THE WITNESS: No, I do not think she was
24 making it up.

25 BY MR. KIRK:

1 Q. Do you think that today?

2 A. I think she is lying about certain people that
3 she's met with, yes.

4 Q. But you don't know whether she's lying or not
5 because you weren't there.

6 Correct?

7 MR. COOPER: Object to the form and lack of
8 foundation.

9 THE WITNESS: I wasn't there.

10 MR. KIRK:

11 Q. Now, you testified about two conversations you
12 had with Virginia in which you say she said that the
13 lawyers were pressuring her to bring allegations against
14 Alan Dershowitz.

15 Do you recall that?

16 A. Yes.

17 Q. I think you said one was a phone call?

18 A. Yes.

19 Q. And I think you said the second might have
20 been at a restaurant or perhaps at your parents' house?

21 A. Yes.

22 Q. Okay. Were those the only two times that she
23 discussed Alan Dershowitz with you?

24 A. Yes.

25 Q. Now, I want to, as my friend did, try to

1 THE WITNESS: Okay.

2 BY MR. KIRK:

3 Q. You certainly don't have to guess.

4 But you think it was probably more than a
5 month before April of 2015 where you had the meeting in
6 the restaurant or your parents' house --

7 A. Yes.

8 Q. -- and you had the phone call in which you say
9 Virginia said that the lawyers were pressuring her?

10 A. Yes, I believe so. Yes.

11 Q. Okay. That's helpful. Thank you. Now, let
12 me find my place.

13 And during this period of time between the end
14 of 2014 and mid-April of 2015, it's fair to say that you
15 and your husband were having financial problems.

16 Correct?

17 A. Fair to say, yes.

18 Q. You had been sued, I guess, for not paying a
19 credit card?

20 MR. COOPER: Objection, relevance.

21 THE WITNESS: That wasn't our financial
22 problems, but yeah, we were. It was only like a
23 thousand dollars.

24 BY MR. KIRK:

25 Q. And it wasn't a financial problem because you

1 couldn't pay it.

2 Right?

3 MR. COOPER: Objection. Relevance.

4 THE WITNESS: No. It just -- that wasn't why
5 we were in the circumstances that we were in. It wasn't
6 because we were getting sued from a credit card.

7 BY MR. KIRK:

8 Q. Were you having problems with your job?

9 MR. COOPER: Objection. Relevance.

10 THE WITNESS: No, I wasn't.

11 BY MR. KIRK:

12 Q. Was your husband having problems with his
13 business?

14 MR. COOPER: Objection. Relevance.

15 THE WITNESS: The -- not his business, no.

16 BY MR. KIRK:

17 Q. Well, what were your financial problems?

18 A. We just -- well, my husband was working for
19 his father at the time and we owned a gym. So, we just
20 weren't being able to make ends meet because, you know,
21 his dad was having, you know, not making as much money
22 at the time. So, he couldn't really pay Michael. And
23 then, you know, the gym was a new business. So, it was
24 kind of -- you know, you don't usually make money in the
25 first few years --

1 Q. Sure.

2 A. -- after opening a business.

3 Q. And during this time, you were living in your
4 mother's house.

5 Is that right?

6 A. My parents' house, yes.

7 Q. And was that because you just couldn't afford
8 to live in your own place?

9 MR. COOPER: Objection. Relevance.

10 THE WITNESS: Yeah. I mean, it was hard to
11 afford to live in our own place, yes.

12 BY MR. KIRK:

13 Q. Now, during the spring of 2015, you and your
14 husband thought about moving to Colorado.

15 Correct?

16 A. Yes, correct.

17 Q. And was that in order to alleviate some of
18 these financial problems?

19 A. Yes, mhm. We saw an opportunity.

20 Q. And, in fact, Virginia was helping you look
21 for apartments in Colorado.

22 Is that right?

23 A. That's correct, yes.

24 Q. Now, when she was helping you look for
25 apartments in Colorado, she was in Colorado.

1 BY MR. KIRK:

2 Q. And Virginia asked you to be on the board of
3 directors of this charity.

4 Is that right?

5 A. Yes, she did.

6 Q. And she asked your husband, Mr. Spallholtz, to
7 also be on the board of directors?

8 A. I don't remember that, but I do remember she
9 wanted him to help with self-defense.

10 Q. Because of his expertise as a --

11 A. Yes.

12 Q. -- self-defense instructor?

13 A. Mhm.

14 Q. I see. And you agreed to be on this charity.
15 Correct?

16 A. I did, yes.

17 Q. And in fact, you filled out paperwork to
18 become corporate officers and directors.

19 Do you recall that?

20 A. I do, yes.

21 Q. And you sent those forms back to Virginia in
22 Colorado?

23 A. Yes.

24 Q. And so, the period of time when you agreed to
25 be on this charity was, again, after Virginia moved back

1 on the right where it says the receiver of the money.

2 A. Right.

3 Q. And that was you, Rebecca Boylan.

4 Do you see that?

5 A. Yes.

6 Q. Do you recall receiving \$1,500 from Western
7 Union that Virginia had sent you?

8 A. I do, yes.

9 Q. And again, the date on this is April 10th,
10 2015. So, two days after the email in which you were
11 sending her information about the cargo trailers.

12 A. Correct.

13 Q. Do you see that?

14 A. Yes.

15 Q. Was the \$1,500 that Virginia sent you through
16 Western Union on April 10, 2015, meant to cover the cost
17 of the moving trailers?

18 MR. COOPER: Object to the form. Lack of
19 foundation.

20 THE WITNESS: It may have, but I don't
21 remember if that was the exact reason for it. I do
22 remember receiving the money, and shortly after is when
23 we decided not to go to Colorado.

24 BY MR. KIRK:

25 Q. What other reason would she have been sending

1 you money?

2 A. That, just that, I guess. Yeah. Just for the
3 trailer or maybe for apartment applications.

4 Q. Did she send you money on any other occasion?

5 A. No, she did not.

6 Q. This was the only time?

7 A. This was the only time, yes.

8 Q. Now, you ultimately didn't rent the trailer.
9 Correct?

10 A. Correct.

11 Q. Did you give her the money back?

12 A. No. I offered to give it back to her, and she
13 said not -- don't. We had an argument. I said, you
14 know, I'll send you back the money. She's like, don't
15 be like that, you know. I asked her for her address so
16 I could send her the money back, and she said, oh, don't
17 be like that. So, we kept it.

18 Q. Do you remember how soon after you received
19 the money that you decided not to move?

20 A. Pretty soon after, I would say. I couldn't
21 tell you exactly.

22 Q. Now, around this time you asked Virginia for
23 \$10,000.

24 Correct?

25 A. I don't remember asking her for \$10,000.

1 privilege, and this isn't a conversation with a lawyer,
2 so.

3 MR. COOPER: I respectfully disagree.

4 MR. KIRK: Okay.

5 MR. COOPER: But go ahead.

6 BY MR. KIRK:

7 Q. Now, with all the lawyers done arguing, let me
8 remind you what the question is.

9 A. Okay.

10 Q. Again, all I'm trying to do is figure out when
11 you told Virginia that you weren't going to be part of
12 her charity. And we know it happened, you testified,
13 after she sent you the \$1,500 on Friday, April 10, 2015.

14 Correct?

15 MR. COOPER: Object to the form and lacks
16 foundation.

17 THE WITNESS: Okay. So, you're asking me if
18 it was a couple days after I received the money. I
19 don't know for sure, to be -- like, I don't, I don't
20 know for sure. Okay, because --

21 BY MR. KIRK:

22 Q. Do you have any reason to believe that you
23 didn't communicate that to her before April 13, 2015,
24 when she's figuring out how to allow you to resign?

25 MR. COOPER: Same objection as the previous

1 one. Go ahead.

2 THE WITNESS: Okay. So -- sorry.

3 MR. KIRK: That's fine. I know. This is
4 hard. Don't worry, you're doing great.

5 THE WITNESS: Okay. So, you're asking me if I
6 got the money a couple days before I decided to resign?

7 MR. KIRK: Yes.

8 THE WITNESS: Okay. I don't know how long it
9 was, but, I mean, because this is April 14th, this
10 conversation, and this is April 10th, so it looks to be
11 that way, yes.

12 BY MR. KIRK:

13 Q. You have no reason to believe it didn't happen
14 during that period --

15 A. Yes.

16 Q. -- between April 10 and April 13?

17 MR. COOPER: Same objections.

18 THE WITNESS: Yes, mhm. I have no -- I mean,
19 according to the emails, then, no. Yes.

20 BY MR. KIRK:

21 Q. You have no reason to believe that that's
22 wrong?

23 MR. COOPER: Same objections.

24 THE WITNESS: No, I don't.

25 MR. KIRK: Okay. Thank you. I'm sorry to --

1 THE WITNESS: That's okay. I just want to
2 answer honestly.

3 MR. KIRK: And I appreciate that.

4 MR. COOPER: We both do.

5 THE WITNESS: Okay.

6 BY MR. KIRK:

7 Q. Now, so, we have you receiving the money on
8 April 10th.

9 A. Mhm.

10 Q. We have the resignation and the decision not
11 to move to Colorado at some point in the next few days
12 after that, and then, again, looking at Spallholtz
13 Exhibit 1, we have -- if you look down at the first
14 email at the bottom, April 15th, that was the initial
15 contact with Mr. Dershowitz.

16 Is that right?

17 MR. COOPER: Object to the form. Lack of
18 foundation.

19 THE WITNESS: Yes, that's right.

20 BY MR. KIRK:

21 Q. Did you send the email to Mr. Dershowitz or
22 did your husband?

23 A. My husband did.

24 Q. Did he show it to you or tell you he was doing
25 it?

1 A. He did, yes.

2 Q. Was it his idea to reach out to Mr.

3 Dershowitz?

4 A. Initially? Yes, it was.

5 Q. Now, Mr. Dershowitz was a complete stranger to
6 you and your husband.

7 Correct?

8 A. Absolutely, yeah. Yes.

9 Q. And in this email, this first email on
10 April 15, he told Mr. Dershowitz that he had information
11 about Virginia and said that it's definitely worth
12 something.

13 Do you see that?

14 MR. COOPER: Object to the form, lack of
15 foundation, and misquotes the document.

16 THE WITNESS: in the email?

17 BY MR. KIRK:

18 Q. It's the first email at the bottom of
19 Spallholtz Exhibit 1.

20 A. I have information that her lawyer is
21 trying -- it's definitely worth something. Yes, I see
22 that.

23 Q. So, in this first communication with a
24 complete stranger, your husband said to Mr. Dershowitz
25 that he had information that would hurt Virginia's

1 at 12:15 a.m.?

2 A. Yes, I believe.

3 MR. COOPER: Object to the form. You're not
4 required to guess.

5 THE WITNESS: I don't know. I don't know.

6 BY MR. KIRK:

7 Q. Now, during this phone call that you had with
8 Mr. Dershowitz, you and Mr. Spallholtz told Mr.
9 Dershowitz about your job situation.

10 Correct?

11 A. In the phone call? I don't remember if we
12 said it in the phone call, but -- yeah, actually, we
13 did. Mhm.

14 Q. And do you recall what you told him?

15 A. Not exactly. I know I had put in, like, my
16 two weeks for me, and Michael had sold the gym. So, we
17 didn't even sell it. We had to give it up.

18 Q. Okay --

19 MR. COOPER: Let her finish, please.

20 MR. KIRK: Were you done?

21 THE WITNESS: I'm sorry?

22 MR. KIRK: Were you done?

23 THE WITNESS: Yes. Yes.

24 MR. COOPER: I object and move to strike under
25 the best evidence rule.

1 MR. COOPER: Object to the form and it's not
2 what she testified to.

3 THE WITNESS: Why was I telling him? I guess
4 I was explaining the situation we were in -- the, the
5 predicament that Virginia had put us in anyway.

6 BY MR. KIRK:

7 Q. You were telling him that you had a major
8 financial problem because you had quit your job and
9 Michael had given up his interest in the gym.

10 Correct?

11 A. Correct. I was able to get my job back, by
12 the way. I didn't, I didn't lose it, so.

13 Q. Yeah. And, in fact, in the email on
14 April 17th, he says you found out today that she -- I
15 assume that's you, right?

16 A. Mhm.

17 Q. -- was able to keep her job.

18 A. Correct.

19 Q. Then he says in the second sentence -- or the
20 second paragraph, Rebecca remembered a few other things
21 that will be helpful, but we would like to know what it
22 is you mean when you say you would like to help us.

23 Dr. Mr. Dershowitz tell you over the phone
24 that he wanted to help you?

25 A. Yeah, he did. Yes.

1 Q. Isn't it true, Ms. Boylan, that what really
2 happened here is that you and your husband were having
3 financial problems. You asked Virginia for \$10,000.
4 She said no. So, you went to Mr. Dershowitz and said,
5 we have all kinds of information. How are you going to
6 help us? And you tried to give him whatever information
7 you could to hurt Virginia because you were angry that
8 she had not given you the money.

9 A. No. I never asked her for \$10,000. Never.

10 Q. But the emails and the texts say what they
11 say, don't they?

12 MR. COOPER: Objection. Argumentative, lack
13 of foundation. Object to form.

14 THE WITNESS: They say what they say, but I
15 can say for 100 percent I never asked Virginia for
16 \$10,000. I mean, I could have kept asking her to send
17 me money, and I didn't. She sent me the \$1,500, we had
18 this argument, and then that was the end of it.

19 BY MR. KIRK:

20 Q. And so, you decide to go talk to Mr.
21 Dershowitz, right? After you had the argument.

22 A. Yeah. Yeah, a couple days --

23 Q. Even though you'd had the conversations that
24 you wanted to tell him about months beforehand.

25 MR. COOPER: Object to the form. Lack of

1 Q. But he didn't tape it all.

2 Correct?

3 MR. COOPER: Objection. Asked and answered.

4 THE WITNESS: I think you're right, yes.

5 BY MR. KIRK:

6 Q. Now, you understood that what Mr. Dershowitz
7 wanted taped was a record of anything that you had to
8 say that would be helpful to him in his lawsuit against
9 Virginia.

10 Correct?

11 MR. COOPER: Object to the form. Lack of
12 foundation.

13 THE WITNESS: Yes. Yes.

14 BY MR. KIRK:

15 Q. He wasn't taping it just --

16 A. For fun, no.

17 Q. -- for fun.

18 A. Obviously.

19 Q. And it appears -- if you read through the
20 transcript of tape A, tape B, tape C -- that what would
21 happen is you would talk for a while off the tape
22 recorder. Then he would say, I'm going to turn the tape
23 recorder on, could you repeat what you said about X, Y
24 and Z.

25 Is that how the conversation went?

1 A. Not that I remember. I, I just remember, I
2 remember him telling me when he was going, you know --
3 asking my permission to tape and me saying, yes, it's
4 okay.

5 Q. But then he would say, please repeat what you
6 told me previously. For example, in tape A, in the
7 first paragraph.

8 A. Um -- tape recorder. Yes.

9 Q. And, similarly, at the first line of tape B,
10 it's inaudible, but then where you repeat basically what
11 you said to me about the man in Columbus and so forth.

12 A. Repeat -- you basically said to me about the
13 man in Columbus and how they intend to get more money --

14 MR. COOPER: Are you asking her if that's what
15 it says?

16 MR. KIRK: No. I'm trying to ask her if the
17 way that -- I'm just trying to get an understanding of
18 the mechanics of how this phone call worked.

19 THE WITNESS: Okay.

20 BY MR. KIRK:

21 Q. And at least, based on what's here, my sense
22 of it is, you would talk for a while, then he'd hear
23 something he liked and he would say, okay, I'm going to
24 turn the tape recorder on, could you please repeat that.

25 Is that what happened?

1 MR. COOPER: Object to the form. Lack of
2 foundation.

3 THE WITNESS: No, I don't believe so. I, I
4 may have talked to him and was telling him things about
5 it. And then, yeah, then he asked me if he could tape
6 it and then I agreed. I don't feel like he was asking
7 me to, like -- I mean, he did ask me to repeat. No, I
8 didn't, I don't remember him, like, telling me to say
9 certain things or --

10 MR. KIRK: Oh, no. I didn't say that.

11 THE WITNESS: Yeah, okay. All right.

12 MR. KIRK: Let's try it again, to make sure we
13 have it correct.

14 THE WITNESS: I'm sorry. I just want to
15 answer honestly, okay?

16 MR. KIRK: I know you do. I understand.

17 BY MR. KIRK:

18 Q. You were telling him things when the recorder
19 was off.

20 Correct?

21 A. Yes.

22 Q. And every once in a while he would hear
23 something and he would say, I would like to turn the
24 recorder on, can you repeat what you just said.

25 MR. COOPER: Object to the form. Lack of

1 foundation.

2 THE WITNESS: I, I believe so, that he asked
3 me to repeat what I just said on tape. Yes.

4 BY MR. KIRK:

5 Q. Okay. But there were many other parts of the
6 conversation where he did not ask you to repeat it on
7 tape.

8 Correct?

9 MR. COOPER: Object to the form. Lack of
10 foundation.

11 THE WITNESS: Not that I remember, yes.

12 BY MR. KIRK:

13 Q. He didn't ask you to repeat the part of the
14 conversation where you were telling him about your job
15 situation for example.

16 Correct?

17 A. Correct.

18 Q. Or when you were telling him about the
19 financial problems you had or the problems you had with
20 the move to Colorado. None of that was taped.

21 Correct?

22 MR. COOPER: Object to the form. Lack of
23 foundation.

24 THE WITNESS: I don't know if we had that
25 conversation in the first -- if he talked about that in

1 the first conversation or if it was just through email,
2 so, no. I mean, he didn't -- if we did have that
3 conversation, he did not ask me to repeat it on tape.
4 Sorry if I sound redundant. I'm just trying to think
5 through my, go through my head.

6 Q. Now, you've said this afternoon that Virginia
7 said that the lawyers were putting pressure on her.

8 Do you recall that?

9 A. I do, yes.

10 Q. And it was in the two conversations we
11 discussed repeatedly.

12 A. For sure, yeah. I --

13 Q. Did she ever tell you why --

14 MR. COOPER: Were you done with your answer?

15 THE WITNESS: No, I guess not. I, I know she
16 may have mentioned it more than twice. But I can say
17 for sure it was two times. Like, I can recall in my
18 brain, you know, my memory, those two times.

19 BY MR. KIRK:

20 Q. Okay. Did she ever tell you why she did not
21 want to go after Mr. Dershowitz?

22 A. Did she ever tell me why. Not that I can
23 recall, no.

24 Q. Okay. Did she ever tell you why the lawyers
25 were pressuring her?

1 A. No.

2 Q. She never said to you that the lawyers were
3 pressuring her to accuse Mr. Dershowitz in order to
4 obtain money from the Victoria's Secret billionaire?

5 MR. COOPER: Object to the form.

6 THE WITNESS: No.

7 BY MR. KIRK:

8 Q. And you never told Mr. Dershowitz that the
9 lawyers were pressuring her in order to obtain money
10 from the Victoria's Secret billionaire?

11 A. Yeah, no. No.

12 Q. You never said that?

13 A. I don't remember her saying that she was being
14 pressured for the Victoria's Secret -- being pressured
15 by her lawyers to go after the Victoria's Secret guy.

16 Q. And she didn't say that she was being
17 pressured to go after Mr. Dershowitz to somehow help her
18 in her case against the billionaire.

19 She never said that, did she?

20 MR. COOPER: Object to the form. Lack of
21 foundation.

22 THE WITNESS: No, I don't think so. No.

23 BY MR. KIRK:

24 Q. And you never suggested to Mr. Dershowitz that
25 she was going after him in order to in some way pressure

1 the Victoria's Secret billionaire.

2 MR. COOPER: Object to the form. Lack of
3 foundation.

4 BY MR. KIRK:

5 Q. Did you ever say that to Mr. Dershowitz?

6 MR. COOPER: Same objections.

7 THE WITNESS: Sorry. Repeat that again?

8 BY MR. KIRK:

9 Q. Did you ever say to Mr. Dershowitz that
10 Virginia told you that she was going after Mr.
11 Dershowitz in order to pressure the Ohio Victoria's
12 Secret billionaire?

13 A. No.

14 Q. Because she never said that to you, you didn't
15 say that to Mr. Dershowitz.

16 Right?

17 A. No. I don't -- no.

18 Q. No, I'm not right or --

19 A. No. I --

20 MR. KIRK: I'm sorry, let's do it again.

21 THE WITNESS: I'm sorry.

22 MR. KIRK: I know, and I know this is hard, so
23 hang in there.

24 THE WITNESS: Okay.

25 BY MR. KIRK:

1 Q. Virginia never said to you, the lawyers are
2 pressuring me to go after Dershowitz in order to in some
3 way get at the Victoria's Secret billionaire.

4 MR. COOPER: Object to the form. Lack of
5 foundation.

6 THE WITNESS: No. No.

7 BY MR. KIRK:

8 Q. And you never told Mr. Dershowitz that there
9 was any connection between the claim against Mr.
10 Dershowitz and the claim against the Victoria's Secret
11 billionaire.

12 A. No. No.

13 Q. Those were two completely separate stories.

14 A. I believe so, yes.

15 Q. And, in fact, if you look on Exhibit 6, in
16 tape A, which is the first tape that Mr. Dershowitz
17 recorded, that's when you tell him about the pressuring
18 by the lawyers.

19 Right?

20 A. Yes.

21 Q. And you tell him about the Victoria's Secret
22 guy in tape B.

23 Correct?

24 A. Yes.

25 Q. And so that was two completely different parts

1 Q. Okay. Now, you testified that you reached a
2 conclusion that Virginia was lying because she said that
3 she did not want to go after Mr. Dershowitz.

4 A. Mhm, yes.

5 Q. And at the same time she said that the lawyers
6 were pressuring her?

7 A. Yes.

8 Q. She never said to you, though, that the
9 allegations against Mr. Dershowitz were false.

10 Did she?

11 MR. COOPER: Object to the form.

12 THE WITNESS: Not like that, no.

13 BY MR. KIRK:

14 Q. You never told Mr. Dershowitz that she said
15 that the allegations against Mr. Dershowitz were false,
16 because she didn't say it.

17 Correct?

18 MR. COOPER: Object to the form --

19 THE WITNESS: Correct.

20 MR. COOPER: -- and lack of foundation.

21 MR. KIRK: Did you get her answer?

22 THE COURT REPORTER: Correct. She said
23 "correct."

24 BY MR. KIRK:

25 Q. You just reached that conclusion because what

1 you did hear her say is that she did not want to go
2 after Mr. Dershowitz.

3 Is that right?

4 A. Yes.

5 Q. You never told Mr. Dershowitz that you did not
6 believe there was any sexual contact between Virginia
7 and him.

8 You never said that to Mr. Dershowitz.

9 Did you?

10 MR. COOPER: Object to form. Lack of
11 foundation.

12 THE WITNESS: I never said that I didn't
13 believe that there was contact between them?

14 MR. KIRK: Yes, between Virginia and Mr.
15 Dershowitz.

16 THE WITNESS: I never said that to him. No, I
17 don't think so.

18 BY MR. KIRK:

19 Q. And you did not tell Mr. Dershowitz that the
20 allegations against Mr. Dershowitz were part of "a
21 massive extortion plot concocted by Virginia and her
22 nationally respected lawyers."

23 You never said that to Mr. Dershowitz.

24 Did you?

25 MR. COOPER: Object to the form. Lack of

1 foundation.

2 THE WITNESS: No. No.

3 BY MR. KIRK:

4 Q. And you're certainly not accusing Virginia or
5 her lawyers of being part of a massive extortion plot.

6 Are you?

7 A. I, I mean -- no. I, I can see it for what it
8 is. I see it, you know, as a way to make money,
9 obviously, but.

10 Q. You never told Mr. Dershowitz that he --
11 strike that.

12 MR. COOPER: Were you done with your answer?

13 THE WITNESS: Yes.

14 MR. COOPER: Okay. Thank you.

15 BY MR. KIRK:

16 Q. Mr. Cooper asked you about a phone call that
17 you had with Virginia after she found out that you
18 talked to Mr. Dershowitz.

19 Do you recall that?

20 A. Mr. Cooper? Oh, sorry. Yes. I'm sorry.

21 Q. That's okay. In that call, Virginia was quite
22 angry.

23 A. Mhm, yes.

24 Q. Isn't it true that she's repeatedly said to
25 you that she couldn't believe you were talking to a

EXHIBIT**1****CLOUD FACEBOOK MESSENGER MESSAGES**

CHAT PARTICIPANTS	
Number of participants	2
Display names	Rebecca Lee Boylan Hoffmann Virginia Giuffre
Local user	Virginia Giuffre
CONVERSATION DETAILS	
Number of messages	42
First message sent date/time	5/25/2011 9:04:29 PM
Last message sent date/time	10/20/2014 12:16:03 PM
Case time zone	(UTC) Coordinated Universal Time

Virginia Giuffre☒ Sent

5/25/2011 9:04:29 PM

OMG!!! Is it really you Becky??? I can't believe how gorgeous you are and who is that charming young man your with (Michael), I am so happy to hear from you...do you have an email and we can get each others phone number? So much to catch up on, am dying to hear how you've been!! xoxox Jenna

Rebecca Lee Boylan Hoffmann☒ Received

5/25/2011 9:24:46 PM

Omg!!! Woman how have u been. This is Becky Boylan in case you where wondering lol:) So tell me what have you been up to it's been forever.I see you have 2 little ones and your married that's awesome. Michael and I are expecting our first in July. I am still here in FL ugh.... Well hit me back if you wanna catch up would love to here from you:) Sent from my iPhone

Rebecca Lee Boylan Hoffmann☒ Received

5/25/2011 9:29:37 PM

Boylan Exh 1

Giuffre-DM-001781

Conversations with Rebecca BoylanTape A

Alan M. Dershowitz: Now turning on a tape recorder and I'm recording with uh your permission. So please repeat what you told me previously.

Rebecca: Okay, um that Virginia never wanted to go after you um but she felt pressure um by her lawyers and that she had never... I've never heard her mention you as when we were kids or you know until very recently after everything has happened in the media but I've never heard her mention you before.

Alan M. Dershowitz: Okay thank you and I'm turning off the tape recorder. Thank you so much.

Tape B

Alan M. Dershowitz: [inaudible] record and where you repeat what you basically said to me before about the uh man in Columbus and um what he um and how they intended to get the amount of money they intended to get from them. That's crucial. So can you give me that for just like 30 seconds?

Rebecca: Okay, I mean she never told me his name. I know it from you saying it.

Alan M. Dershowitz: We know his name of course.

Rebecca: Okay...

Alan M. Dershowitz: Tell me how she described him to you.

Rebecca: She just said that he owned Victoria Secret and Limited Too, and that he had lots and lots of money. You know, was a billionaire.

Alan M. Dershowitz: Great. And what did they want to do?

Rebecca: They wanted to sue him for at least half his money and use it for the charities that they're trying to start.

Alan M. Dershowitz: And what would the lawsuit be based on?

Rebecca: Oh I guess the she didn't say exactly, just being affiliated with Epstein the alleged you know and partaking you know in the girls that he would provide them or provide him.

Alan M. Dershowitz: Yeah. And did they think they would have to bring the lawsuit or would they just be able to threaten the lawsuit and he would pay the money?

Boylan ex 6

Rebecca: She made it sound like to me that they were already talking to him and they were, they had already you know in the process of suing him.

Alan M. Dershowitz: Aha. And was he going to then you think settle it or was he actually going to litigate it... what did it sound like?

Rebecca: She didn't really say but she made it sound like she as pretty positive about it and then I didn't hear about it for like months and then you know the last time she talked about the charity, it wasn't about him anymore, it was about just you know raising money going to like you know celebrity charity events to get money or I remember her you know showing she was going to do a bunch of television interview um to raise the... and use that money that they were paying her for the interviews to help get it started.

Alan M. Dershowitz: Right but that would be...

Rebecca: And the lawyers contributed their own money into it probably like, I don't know, like \$80,000 or something like that.

Alan M. Dershowitz: They contributed \$80,000 to what, to the fund?

Rebecca: The charity yeah, to get it started for her.

Alan M. Dershowitz: And were the lawyers charging her or how did that work... do you know?

Rebecca: Nope, I mean, uh, she, to her, I think the result of her, or what do you call it, pro bono, they weren't charging anything for their, ya know.

Alan M. Dershowitz: But did they expect to get something out of it if they sued this rich guy in Columbus from Victoria Secret.

Rebecca: Really, it's, she didn't say it exactly but that's just kind of like, you know, looking at it in retrospect, that's how it seemed, you know, it just seemed like it was, they saw an opportunity to make a lot of money.

Alan M. Dershowitz: And did she mention, she didn't mention who the lawyers are or where they were from did she?

Rebecca: No. I just have that paperwork that was sent to me by... from them.

Alan M. Dershowitz: right. Sure. But do you know who sent it to you?

Rebecca: Um, she sent, I mean, no, I don't know exactly, she sent it to me... it was forwarded from her email to my email.

Alan M. Dershowitz: Right. And my understanding is that she was going to try to get the uh ABC to uh give her some credibility so that that would increase the leverage on being able to get a settlement or a lawsuit?

Rebecca: Yeah, I mean...

Alan M. Dershowitz: Yeah, alright, well I appreciate that and again just repeat you gave me permission to record this and um would you just say yes so?

Rebecca: Okay, yes.

Alan M. Dershowitz: I appreciate that. Thank you. If you can think of anything else, just please, please let me know because um this is very, very important.

Tape C

Alan M. Dershowitz: I'm recording now with your permission so just tell me the story as as simply as you can.

Rebecca: Okay about the interaction that I had with her where she told me about what was going to happen when it came to starting this charity?

Alan M. Dershowitz: Right.

Rebecca: ... is what you're asking?

Alan M. Dershowitz: Yeah, yeah.

Rebecca: Okay. Um you want me to talk now.

Alan M. Dershowitz: Yeah, sure.

Rebecca: Ok alright, earlier we were together on Clemantis we had dinner at Dempsey's and she just kind of told me about how she was going to sue the man who owned Limited Too and Victoria Secret for lots of money and that they were going to be able to take that money and start this charity to help you know women that had been trafficked and that you know there were other big names that she was going to be able to um also um refer to what happened or what she said had happened when she was younger. Uh I don't know exactly what else. She didn't really mention names just one, just the one that I don't remember his, the guy who owns, you know, Victoria Secret and all that and uh she also said to me that when it came to Alan Dershowitz that she did feel pressure to go after you, after him... um her, you know to, she felt pressure to do it, she didn't want to go after you specifically, that she felt pressured by her lawyers to do that.

Alan M. Dershowitz: Alright, well thank you very much I really appreciate it. You know, we were recording this with your permission. I'm going to turn off the recording now.
